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Attorneys for Plaintiffs

U.S. DISTRICT COURT NORTHERN DISTRICT OF CALIFORNIA

KRISTA O'DONOVAN, EDUARDO DE LA
TORRE, and LORI SAYSOURIVONG,
individually and on behalf of all others
similarly situated,

Plaintiffs,

v.

CASHCALL, INC., a California corporation,
and DOE 1 through DOE 50, inclusive,

Defendants.

CASHCALL, INC., a California corporation,

Counterclaimant,

v.

LORI SAYSOURIVONG and EDUARDO DE
LA TORRE, individually and on behalf of all
others similarly situated,

Counterdefendants.

Case No.: CV 08-3174-MEJ

CLASS ACTION

**STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING CASE DEADLINES**

Courtroom: B – 15th Floor
Judge: Hon. Maria-Elena James

Complaint filed: July 1, 2008

1 Plaintiffs and Counterdefendants Eduardo de la Torre and Lori Saysourivong (“Plaintiffs”) and
 2 Defendant and Counterclaimant CashCall, Inc. (“Defendant”), through their respective counsel of
 3 record, stipulate as follows:

4 WHEREAS the parties have diligently engaged in discovery in this matter, including engaging in
 5 extensive good faith, meet and confer on discovery disputes;

6 WHEREAS the parties submitted a Joint Case Status Update on May 4, 2013;

7 WHEREAS in this Court’s May 7, 2013 Case Management Order, this Court set a deadline for
 8 expert reports of May 24, 2013, rebuttal expert disclosure of June 3 and discovery closure of June 18.
 9 *See* Dkt. #137;

10 WHEREAS Plaintiffs submitted a Request for a Status Conference to Address Scheduling of
 11 Dates on April 23, 2013 in which they requested that the Court extend the case management deadlines
 12 set in its May 7, 2013 Order. *See* Dkt. #138;

13 WHEREAS the Court issued an Order granting Plaintiffs’ Request to Extend Case Management
 14 Deadlines on April 24, 2013. *See* Dkt. #139;

15 WHEREAS the current case management deadlines are as follows: All pretrial motions shall be
 16 filed and served by September 19, 2013, the hearing on dispositive motions shall be October 24, 2013,
 17 All factual and expert discovery must be completed by August 15, 2013, all expert witness reports shall
 18 be disclosed by July 19, 2013, and all rebuttal expert witness reports shall by disclosed by August 5,
 19 2013;

20 WHEREAS the parties now agree that a modest extension of time to complete discovery and
 21 expert reports is necessary;

22 NOW, THEREFORE, Plaintiffs and Defendant, through their respective counsel of record,
 23 stipulate, as follows:

24 The case management deadlines in the case shall be modified as follows:

25 Expert Disclosures September 18, 2013

26 Factual Discovery Cut-off September 18, 2013

27 Expert Discovery Cut-off October 15, 2013

Dispositive Motion Deadline October 17, 2013

Hearing on Dispositive Motions November 21, 2013

DATED: July 9, 2013

THE STURDEVANT LAW FIRM

ARTHUR D. LEVY

TERRELL MARSHALL DAUDT & WILLIE

By: /s/ Whitney Stark
Whitney Stark
Attorneys for Plaintiffs

DATED: July 9, 2013

MANATT, PHELPS & PHILLIPS, LLP

By: /s/ Brad W. Seiling
Brad W. Seiling
Attorneys for Defendant


~~Proposed~~ Order

Having read the Parties' stipulation, the Court adopts its reasoning as the Court's own and orders that the deadlines in the case should be modified as follows:

Expert Disclosures	September 18, 2013
Factual Discovery Cut-off	September 18, 2013
Expert Discovery Cut-off	October 15, 2013
Dispositive Motion Deadline	October 17, 2013
Hearing on Dispositive Motions	November 21, 2013

IT IS SO ORDERED.

Dated: July 10, 2013



Maria-Elena James
Chief United States Magistrate Judge

Filer's Attestation: Pursuant to General Order No. 45, Section X(B) regarding signatures, Brad Seiling hereby attests that concurrence in the filing of this document has been obtained.